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**Attorneys for Plaintiff**  
**CELLCO PARTNERSHIP d/b/a**  
**VERIZON WIRELESS**

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

CELLCO PARTNERSHIP d/b/a  
VERIZON WIRELESS,

Plaintiff,

v.

TORO RIDE, INC.; KAREN KEVIN  
GALSTIAN and DOES 1-10, Inclusive,

Defendants.

CASE NO. 2:15-CV-1187-DSF (PLAx)

**STIPULATION TO DISMISS FIRST  
AMENDED COMPLAINT**

Action Filed: 02/18/15  
Trial Date: None Set

1 Plaintiff Cellco Partnership d/b/a Verizon Wireless (“Verizon Wireless”) and  
2 Defendants Toro Ride, Inc. and Karen Kevin Galstian (collectively “Defendants”),  
3 stipulate as follows:

4 1. On March 16, 2015, the Court issued a preliminary injunction in favor  
5 of Verizon Wireless in this matter. (Docket No 53.)

6 2. On April 3, 2015, the parties filed a stipulation with the Court, noting  
7 that, among other things, Defendants intended to file a motion requesting that the  
8 Court stay the instant action while the related criminal case against Defendant  
9 Galstian is pending. (Docket No. 72.)

10 3. On April 7, 2015, the Court entered an order staying the case through  
11 October 19, 2015, with the exception that Plaintiff Cellco Partnership d/b/a Verizon  
12 Wireless could continue to conduct discovery and take other steps to identify and  
13 attach Defendant Toro Ride, Inc.’s assets. (Docket No. 73.)

14 4. On December 17, 2015, the Court issued a second order staying the  
15 case through January 18, 2016. (Docket No. 107.) Thereafter, the Court issued two  
16 more orders staying the case through March 28, 2016, while the criminal case  
17 against Defendant Galstian remained pending in the Southern District of California,  
18 Case No. 3-15-cr-2509-BTM-1.

19 5. On March 21, 2016, Defendant Galstian was sentenced to 100 months  
20 in prison and ordered to pay over \$17 million in restitution to Verizon Wireless.

21 6. Now that Defendant Galstian has been sentenced, the parties stipulate  
22 that the Court should dismiss the pending First Amended Complaint as to all  
23 defendants without prejudice.

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2 7. A proposed order is submitted concurrently with this stipulation.

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4 DATED: April 7, 2016

Respectfully submitted,

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SCHEPER KIM & HARRIS LLP

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DAVID C. SCHEPER

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JEAN M. NELSON

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GREGORY A. ELLIS

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ALEXANDER H. COTE

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By: /s/ Jean M. Nelson

11

Jean M. Nelson

12

Attorneys for Plaintiff

CELLCO PARTNERSHIP d/b/a

VERIZON WIRELESS

13

DATED: April 7, 2016

BEITCHMAN ZEKIAN PC

14

David P. Beitchman

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Andre Boniadi

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Rouben Varozian

17

By: /s/ Andre Boniadi

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Andre Boniadi

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Attorneys for Defendants

TORO RIDE, INC. and KAREN KEVIN

20

GALSTIAN

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### **SIGNATURE ATTESTATION**

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I hereby attest that all of the signatories electronically listed above concur in

23

this filing's content and have authorized the filing in compliance with Local Rule 5-

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4.3.4.(a)(2)(i).

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By: /s/ Jean M. Nelson

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Jean M. Nelson

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2016, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF System, which will send notification of the filing to all counsel of record.

/s/ Jean M. Nelson

Jean M. Nelson